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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**MARGO PERRYMAN, on behalf of
herself and all others similarly situated,**

Plaintiff,

v.

**LITTON LOAN SERVICING, LP,
OCWEN LOAN SERVICING, LLC,
SOUTHWEST BUSINESS
CORPORATION, and AMERICAN
SECURITY INSURANCE COMPANY,**

Defendants.

Case No. 3:14-cv-02261-JST

**JOINT STIPULATION TO EXTEND TIME
FOR LITTON LOAN SERVICING, LP,
OCWEN LOAN SERVICING, LLC, AND
SOUTHWEST BUSINESS CORPORATION
TO RESPOND TO COMPLAINT**

~~PROPOSED~~ ORDER

Ctrrm.: 9 - 19th Floor

The Hon. Jon S. Tigar

Pursuant to Civil L.R. 6-1(b) and 6.2, it is hereby stipulated by and between Plaintiff, Defendant Litton Loan Servicing, LP (“Litton”), Defendant Ocwen Loan Servicing, LLC (“Ocwen”), and Defendant Southwest Business Corporation (“Southwest”) through their respective attorneys, that:

WHEREAS, on May 15, 2014 Plaintiff filed her Complaint in this action (ECF No. 1);

WHEREAS, Defendants Litton, Ocwen, and Southwest were served with a copy of the Summons and Complaint on May 19, 2014 (ECF Nos.17-18, 20);

WHEREAS, pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), Litton’s, Ocwen’s, and Southwest’s responses to the Complaint were due on June 9, 2014;

WHEREAS, on June 5, 2014, Defendant American Security Insurance Company (“ASIC”) filed a stipulation (ECF No. 23) on behalf of itself, Litton, Ocwen, and Plaintiff to extend the briefing schedule to allow:

- ASIC, Litton and Ocwen until June 20, 2014 to respond to the Complaint;
- Plaintiff’s opposition to ASIC’s, Litton’s, and Ocwen’s responses to the Complaint would be due July 15, 2014;
- ASIC’s, Litton’s, and Ocwen’s replies would be due July 25, 2014; and
- a hearing on the motions would be held on August 15, 2014 at 9:30 a.m. or on a subsequent date of the Court’s preference;

WHEREAS, on June 6, 2014, the Court granted the joint stipulation and adopted the above briefing schedule and August 15, 2014 hearing date (ECF No. 24);

WHEREAS, on June 10, 2014, Defendant Southwest Business Corporation (“Southwest”) filed a joint stipulation with Plaintiff extending Southwest’s deadline to respond to the Complaint to June 30, 2014, Plaintiff’s opposition to July 21, 2014, and Southwest’s reply to July 31, 2014 (ECF No. 25);

WHEREAS, on June 17, 2014, the Court granted the joint stipulation regarding Southwest’s briefing schedule and adopted the above briefing schedule and August 15, 2014 hearing date (ECF No. 30);

1 WHEREAS, Litton, Ocwen, and Southwest desire additional time to evaluate the
2 Complaint and prepare responses;

3 WHEREAS, Plaintiff, Litton, Ocwen, and Southwest have consulted and agreed on an
4 alternative schedule to provide additional time;

5 WHEREAS, on June 17, 2014, this case was reassigned to the Honorable Jon S. Tigar
6 and the August 15, 2014 hearing date was vacated;

7 WHEREAS, given Judge Tigar's hearing schedule, the first available date for a hearing
8 would be August 21, 2014;

9 WHEREAS, this is the second request for an extension of time for Litton, Ocwen, and
10 Southwest, providing Defendants a total of a three-week extension to respond to the Complaint
11 and its twelve causes of action;

12 WHEREAS, this stipulation applies only to the briefing schedule for Litton's, Ocwen's,
13 and Southwest's responsive pleadings, and not the schedule for the other defendants' responsive
14 pleadings.

15 NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED THAT, subject to
16 the Court's approval, the following schedule shall govern:

- 17 • Litton's, Ocwen's, and Southwest's responses to the Complaint shall be filed on or
18 before June 30, 2014;
- 19 • Plaintiff's opposition to Litton's, Ocwen's, and Southwest's responses shall be filed
20 on or before July 28, 2014;
- 21 • Litton's, Ocwen's, and Southwest's replies to Plaintiff's opposition shall be filed on
22 or before August 7, 2014; and
- 23 • The hearing on Litton's, Ocwen's, and Southwest's motions shall be on August 21,
24 2014 at 2:00 p.m. or on another date of the Court's preference.

1 SEEN AND AGREED:

2 Dated: June 19, 2014

Respectfully Submitted,

3 BUCKLEYSANDLER LLP

4
5 /s/ Fredrick S. Levin

6 Fredrick S. Levin (Bar No. 187603)

7 *Attorney for Litton Loan Servicing, LP*
8 *and Ocwen Loan Servicing, LLC*

9 Dated: June 19, 2014

Respectfully Submitted,

10 LAW OFFICE OF SHERI L. KELLY

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13 /s/ Sheri L. Kelly (with consent)

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16 31 E. Julian Street
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20 *Attorney for Plaintiff*

21 Dated: June 19, 2014

Respectfully Submitted,

22 DILLINGHAM & MURPHY, LLP

23 /s/ Dennis J. Kelly (with consent)

24 Dennis J. Kelly
25 601 California Street, Suite 1900
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27 Telephone: (415) 397-2700
28 Facsimile: (415) 397-3300

FILER'S ATTESTATION

The undersigned filer attests, pursuant to Civil L.R. 5-1(i)(3), that concurrence in the filing of the documents has been obtained from the other signatory to this document.

Dated: June 19, 2014

Respectfully Submitted,

BUCKLEYSANDLER LLP

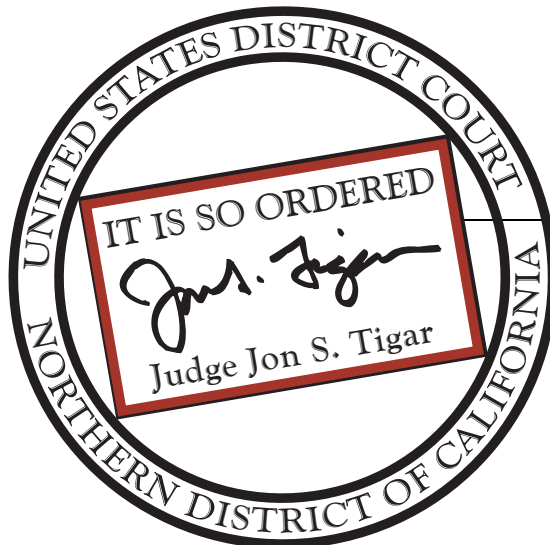
/s/ Fredrick S. Levin
Fredrick S. Levin (Bar No. 187603)

*Attorney for Litton Loan Servicing, LP
and Ocwen Loan Servicing, LLC*

PURSUANT TO STIPULATION, IT IS SO ORDERED:

- Litton's, Ocwen's, and Southwest's responses to the Complaint shall be filed on or before June 30, 2014;
- Plaintiff's opposition to Litton's, Ocwen's, and Southwest's responses shall be filed on or before July 28, 2014;
- Litton's, Ocwen's, and Southwest's replies to Plaintiff's opposition shall be filed on or before August 7, 2014;
- Hearing on Litton's, Ocwen's, and Southwest's motions shall be on August 21, 2014 at 2:00 p.m.; and
- This schedule will not alter the existing briefing deadlines for ASIC responsive pleadings.

Dated: June 20, 2014



DECLARATION OF FREDRICK S. LEVIN

I, Fredrick S. Levin, declare:

1. I am an attorney duly admitted to practice before this Court. I am a partner with the law firm of BuckleySandler LLP, counsel for Defendants Litton Loan Servicing, LP (“Litton”) and Ocwen Loan Servicing, LLC (“Ocwen”) in this case. I have personal knowledge of the facts set forth below.

2. As set forth in the above stipulation, Plaintiff, Litton, Ocwen, and Southwest have stipulated to the following schedule:

- a. Litton’s, Ocwen’s, and Southwest’s responses to the Complaint shall be filed on or before June 30, 2014;
- b. Plaintiff’s opposition to Litton’s, Ocwen’s, and Southwest’s responses shall be filed on or before July 28, 2014;
- c. Litton’s, Ocwen’s, and Southwest’s replies to Plaintiff’s opposition shall be filed on or before August 7, 2014; and
- d. Hearing on Litton’s, Ocwen’s, and Southwest’s motions shall be on August 21, 2014 at 2:00 p.m.

3. Litton and Ocwen have been working diligently to prepare their responses to the Complaint but they seek this extension because they cannot fully develop their responses without additional time to evaluate the Complaint and to gather and review documentation relevant to its defenses and jurisdictional issues, some of which are believed to be in the control of third parties;

4. The only other matters currently scheduled are briefing schedules for other Defendants’ responses to the Complaint and a case management conference, which will not be impacted by this extension.

5. There was one prior time modification in this case for Litton, Ocwen, and Southwest as outlined in the above stipulation.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

3 Executed this 19th day of June 2014 at Santa Monica, CA.

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5 /s/ Fredrick S. Levin
6 Fredrick S. Levin
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